

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
LAWRENCE ORGAN IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: January 8, 2020
Time: 2:00 p.m.
Courtroom: 2, 17th Floor
Judge: Hon. William H. Orrick

Trial Date: March 2, 2020
Complaint filed: October 16, 2017

1 I, LAWRENCE A. ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion to Retain Confidentiality.
6 I have personal knowledge of the facts stated herein and if called upon to testify, I could and
7 would competently testify thereto, except as to those matters that are stated upon information and
8 belief.
9

10 2. Attached hereto and marked as Exhibit 1 is a true and correct copy of a document
11 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000185-
12 TESLA0000186. Defendant marked this document as "confidential" pursuant to the Protective
13 Order and the document should therefore be sealed pursuant to this Order.
14

15 3. Attached hereto and marked as Exhibit 2 is a true and correct copy of a document
16 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000140-
17 TESLA0000142. Defendant marked this document as "confidential" pursuant to the Protective
18 Order and the document should therefore be sealed pursuant to this Order.
19

20 4. Attached hereto and marked as Exhibit 3 is a true and correct copy of a document
21 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA000004-
22 TESLA000008. Defendant marked this document as "confidential" pursuant to the Protective
23 Order and the document should therefore be sealed pursuant to this Order.
24

25 5. Attached hereto and marked as Exhibit 4 is a true and correct copy of a document
26 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000805-
27 TESLA0000808. Defendant marked this document as "confidential" pursuant to the Protective
28 Order and the document should therefore be sealed pursuant to this Order.

1 6. Attached hereto and marked as Exhibit 5 is a true and correct copy of a document
2 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000844-
3 TESLA0000849. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Exhibit 6 is a true and correct copy of a document
6 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000889. Defendant
7 marked this document as “confidential” pursuant to the Protective Order and the document
8 should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Exhibit 7 is a true and correct copy of a document
10 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000211-
11 TESLA0000219. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Exhibit 8 is a true and correct copy of a document
14 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000308. Defendant
15 marked this document as “confidential” pursuant to the Protective Order and the document
16 should therefore be sealed pursuant to this Order.

17 10. Attached hereto and marked as Exhibit 9 is a true and correct copy of a document
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000663. Defendant
19 marked this document as “confidential” pursuant to the Protective Order and the document
20 should therefore be sealed pursuant to this Order.

21 11. Attached hereto and marked as Exhibit 10 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000518.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 12. Attached hereto and marked as Exhibit 11 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000863-
3 TESLA0000878. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Exhibit 12 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000702-
7 TESLA0000703. Defendant marked this document as “confidential” pursuant to the Protective
8 Order and the document should therefore be sealed pursuant to this Order.

9 14. Attached hereto and marked as Exhibit 13 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000309.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 15. Attached hereto and marked as Exhibit 14 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000905-
15 TESLA0001013. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 16. Attached hereto and marked as Exhibit 15 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000063-
19 TESLA000065. Defendant marked this document as “confidential” pursuant to the Protective
20 Order and the document should therefore be sealed pursuant to this Order.

21 17. Attached hereto and marked as Exhibit 16 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000175.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 18. Attached hereto and marked as Exhibit 17 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000200.
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 19. Attached hereto and marked as Exhibit 18 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000309.
7 Defendant marked this document as “confidential” pursuant to the Protective Order and the
8 document should therefore be sealed pursuant to this Order.

9 20. Attached hereto and marked as Exhibit 19 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000371.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 21. Attached hereto and marked as Exhibit 20 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000389.
15 Defendant marked this document as “confidential” pursuant to the Protective Order and the
16 document should therefore be sealed pursuant to this Order.

17 22. Attached hereto and marked as Exhibit 21 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000299.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 23. Attached hereto and marked as Exhibit 22 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000408-
23 TESLA0000421. Defendant marked this document as “confidential” pursuant to the Protective
24 Order and the document should therefore be sealed pursuant to this Order.

1 24. Attached hereto and marked as Exhibit 23 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000422-
3 TESLA0000466. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 25. Attached hereto and marked as Exhibit 24 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000467-
7 TESLA0000481. Defendant marked this document as “confidential” pursuant to the Protective
8 Order and the document should therefore be sealed pursuant to this Order.

9 26. Attached hereto and marked as Exhibit 25 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000676.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 27. Attached hereto and marked as Exhibit 26 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000679.
15 Defendant marked this document as “confidential” pursuant to the Protective Order and the
16 document should therefore be sealed pursuant to this Order.

17 28. Attached hereto and marked as Exhibit 27 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000684.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 29. Attached hereto and marked as Exhibit 28 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000686.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 30. Attached hereto and marked as Exhibit 29 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000688.
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the
4 document should therefore be sealed pursuant to this Order.

5 31. Attached hereto and marked as Exhibit 30 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000716.
7 Defendant marked this document as “confidential” pursuant to the Protective Order and the
8 document should therefore be sealed pursuant to this Order.

9 32. Attached hereto and marked as Exhibit 31 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000725.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 33. Attached hereto and marked as Exhibit 32 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000729.
15 Defendant marked this document as “confidential” pursuant to the Protective Order and the
16 document should therefore be sealed pursuant to this Order.

17 34. Attached hereto and marked as Exhibit 33 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000751.
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 35. Attached hereto and marked as Exhibit 34 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000762.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 36. Attached hereto and marked as Exhibit 35 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000776-
3 TESLA0000778. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 37. Attached hereto and marked as Exhibit 36 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000779-
7 TESLA0000801. Defendant marked this document as “confidential” pursuant to the Protective
8 Order and the document should therefore be sealed pursuant to this Order.

9 38. Attached hereto and marked as Exhibit 37 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000802.
11 Defendant marked this document as “confidential” pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 39. Attached hereto and marked as Exhibit 38 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000805-
15 TESLA0000808. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 40. Attached hereto and marked as Exhibit 39 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000809-
19 TESLA0000815. Defendant marked this document as “confidential” pursuant to the Protective
20 Order and the document should therefore be sealed pursuant to this Order.

21 41. Attached hereto and marked as Exhibit 40 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000818.
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the
24 document should therefore be sealed pursuant to this Order.

1 42. Attached hereto and marked as Exhibit 41 is a true and correct copy of a
2 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000819-
3 TESLA0000824. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 43. Attached hereto and marked as Exhibit 42 is a true and correct copy of a
6 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000842-
7 TESLA0000843. Defendant marked this document as “confidential” pursuant to the Protective
8 Order and the document should therefore be sealed pursuant to this Order.

9 44. Attached hereto and marked as Exhibit 43 is a true and correct copy of a
10 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000844-
11 TESLA0000851. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 45. Attached hereto and marked as Exhibit 44 is a true and correct copy of a
14 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000825-
15 TESLA0000841. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 46. Attached hereto and marked as Exhibit 45 is a true and correct copy of a
18 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000852-
19 TESLA0000862. Defendant marked this document as “confidential” pursuant to the Protective
20 Order and the document should therefore be sealed pursuant to this Order.

21 47. Attached hereto and marked as Exhibit 46 is a true and correct copy of a
22 document produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0000879-
23 TESLA0000888. Defendant marked this document as “confidential” pursuant to the Protective
24 Order and the document should therefore be sealed pursuant to this Order.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on December 9, 2019 in San Anselmo, California.
3
4
5

6 DATED: December 9, 2019

By: /s Lawrence Organ
Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
J. Bernard Alexander, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ